

REMARKS

Applicants have cancelled claims 27 and 28 and amended claims 1-9, 11-19, 21-26 and 29-31. Claims 3 and 4, which were only objected to as depending from a rejected base claim, have been amended to appear in independent form. Claims 21 and 22 have been amended to include the limitations of claim 28, which was only objected to by the Examiner. Claim 1 has been amended to recite the connecting pipe, which finds support, for example, at page 16, lines 3-15, and FIG. 1A of the application. A limitation recited in original claim 1, which was redundantly recited in claim 5, has been removed from claim 1. Other claims have been amended to improve English usage without changing claim scope.

Claims 7, 18 and 29 have been rejected under 35 USC 112, second paragraph, as indefinite because of the lack of proper antecedent basis. This rejection is overcome by the amendments set forth above.

Claims 1, 2 and 5-10 have been rejected under 35 USC 102(e) as anticipated by U.S. Patent Application Publication No. 2003/0121864 (Kin). Applicants respectfully traverse this rejection.

Claim 1 as amended recites a connecting pipe connecting the first tank in which the filter device is disposed and the second tank in which the electrodes are disposed. The Examiner contends that Kin's ultra-filtration membrane pipe 17 corresponds to the claimed first tank and Kin's electrocoagulation reaction tank 8 corresponds to the claimed second tank. However, Kin's first and second tanks are separated by rear adjustment tank 11, sedimentation reservoir 13, temporary storage tank 15 and pipes connecting these device elements. They are not connected by a connecting pipe as claimed. See paragraph [0034] of Kin. No part of Kin teaches or suggests the claimed connecting pipe. In fact, Kin's device relies on sedimentation for removing the flocules made by Kin's reaction tank 8 and not on the filtering as claimed. See paragraph [0034] of Kin. Thus, Kin's device cannot and does not have the connecting pipe connecting the first and second tanks as claimed.

The rejection of claims 1, 2 and 5-10 under 35 USC 102(e) on Kin should be withdrawn because Kin does not teach or suggest the claimed connecting pipe.

Claims 11, 12, 15 and 18-20 have been rejected under 35 USC 102(e) anticipated by Kin. Applicants respectfully traverse this rejection.

Claim 11 states that microparticle components contained in a fluid are removed by filtering the fluid through a gel-form second filter formed on a surface of a first filter, and nitride compounds contained in the fluid are removed electrochemically. The Examiner contends that Kin's electrocoagulation reaction tank 8 performs the claimed electrochemical removal of the nitride compounds. Applicants respectfully disagree. No part of Kin discloses any electrochemical removal of nitride compounds as claimed. All Kin teaches with respect to any electrochemical treatment is that "the iron electrode releases ferrous ions which undergo an electro oxidation reaction with H₂O₂ added in the previous adjustment tank while being converted into ferric hydroxide floccules." See paragraph [0034] of Kin.

The rejection of claims 11, 12, 15 and 18-20 under 35 USC 102(e) on Kin should be withdrawn because Kin does not teach or suggest the claimed electrochemical removal of the nitride compounds.

The rejection of claims 21, 23-27 and 29-31 should be withdrawn because claim 21 as amended includes the limitations of claim 28 that was only objected to by the Examiner. Likewise, the rejection of claims 22, 23-27 and 29-31 should be withdrawn because claim 22 as amended includes the same limitations.

In light of the above, a Notice of Allowance is solicited.

In the event that the transmittal letter is separated from this document and the Patent and Trademark Office determines that an extension and/or other relief is required, applicant petitions

for any required relief including extensions of time and authorizes the Commissioner to charge the cost of such petitions and/or other fees due in connection with the filing of this document to Deposit Account No. 03-1952, referencing Docket No. 492322017000.

Respectfully submitted,

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